

201-13722

May 01, 2002

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

Registration Number:

Dear Administrator Whitman:

FMC Corporation actively supports the EPA HPV Challenge Program, AR-201 and hereby submits an addendum to FMC's December 28, 2001 Closed System Intermediate documentation for the chemical:

- Cyclopropanecarboxylic acid, 3(2,2-dichloroethenyl)-2,2-dimethyl-, methyl ester -- CAS No. 61898-95-1

Documentation supplied by our customer, Syngenta Crop Protection Inc., indicates that cyclopropanecarboxylic acid is transported to the plant in sealed tank trailers and is totally consumed within the process. A process diagram is attached for reference. This addendum, in addition to documentation previously submitted by FMC, further supports Closed System Intermediate status for this chemical.

Please contact me if you have comments or questions regarding this addendum.

Sincerely,

Natalie Rutherford  
Global Regulatory, FMC Corporation  
Telephone: 215.299.6680